

UNITED STATES OF AMERICA

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FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, DC 20554

Re: FCC Docket No. RM-9719
Proposed Emergency Radio Data Service

NOV 12 1999

WRITTEN COMMENTS OF THE AMHERST ALLIANCE

THE AMHERST ALLIANCE is a nationwide citizens' advocacy group, with members recruited and mobilized primarily over The Internet. We advocate media diversity in general and Low Power Radio in particular.

We hereby submit our Written Comments on the proposal, in RM-9719, to establish an Emergency Radio Data Service (ERDS) on 87.9. These Comments are being filed electronically, with hard copies sent to the FCC as a "backup".

FIRST, we thank and commend the FCC for honoring requests, by REC Networks and Federal Signal, for a comment deadline extension to November 8.

SECOND, we join REC Networks, and others, in opposing the current RM-9719 proposal. Because the present ERDS proposal would universally pre-empt the 87.9 FM frequency -- without regard to possible Low Power Radio stations -- it would unduly restrict the availability of radio frequencies for Low Power Radio. We believe it makes no moral or practical sense to handicap the new Low Power Radio Service before it has even been born.

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THIRD, communicating information about emergency conditions is clearly a high priority concern. However, there are alternatives to relying on a system which pre-empts opportunities for Low Power Radio. In fact, Low Power Radio itself is such an alternative. With their small size and resulting localized focus, plus their willingness to cooperate with reasonable requirements for emergency preparedness and notification, Low Power stations can be excellent conduits for information to the public during emergencies.

Further, as we have noted in our Written Comments in MM 99-25, Low Power stations are typically either mobile units or base stations that can be disassembled, relocated and then reassembled very quickly. The same cannot be said of most full power radio and TV stations. Also, when compared to conventional radio and TV stations, Low Power stations are generally less connected to disruptable infrastructure, such as central feeds for programming or towers and studios that are located miles apart. LIKE many full power stations, however, they are sometimes equipped with independent "backup" generators.

Viewing the overall picture, Low Power Radio stations are more "survivable" in a disaster than either full power radio and TV stations or the proposed ERDS -- particularly if the disaster disrupts infrastructure over a very wide area (as would be the case with a major earthquake or a terrorist hydrogen bomb).

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The proof of this particular pudding is the fact that "ham" stations, which are somewhat similar to Low Power Radio stations, frequently operate in disaster areas, long after conventional broadcasts have been knocked out of commission.

We also recommend another alternative, which is NOT mutually exclusive. The FCC can stop relying on the purely voluntary cooperation of full power radio stations with emergency preparedness and notification policies. At Amherst, we have heard numerous reports -- both official and unofficial -- of stations that have ignored emergency coverage, and remained with "canned" commercial programming, even in the face of impending tornadoes and ongoing hurricanes.

Before it establishes an Emergency Radio Data Service that pre-empts opportunities for current and potential broadcasters, the FCC should first make better and broader use of the institutions which it is already regulating (or, in the case of Low Power Radio, on the verge of regulating). This means reasonable but MANDATORY emergency preparedness and notification requirements -- for BOTH full power radio and Low Power Radio.

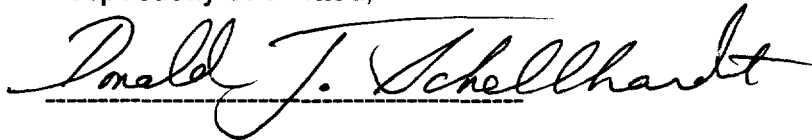
We add that many aspiring Low Power Radio broadcasters are also hams. As we stated in our MM 99-25 Written Comments, ham operators have made a major difference in many disasters. They can do even more if they own Low Power Radio stations. As for Low Power broadcasters who are NOT hams, possible links to the American Radio Relay League, and/or to others in the ham community, can be a cost-effective source of guidance and/or training.

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In any case, only AFTER such steps have been taken should the Commission consider whether more drastic and disruptive action is still needed.

IN CONCLUSION, we urge the FCC to refrain from taking action on the proposal in RM-9719. Instead, we urge the FCC to initiate action to establish reasonable but mandatory requirements, regarding emergency preparedness and notification, for both full power radio stations and Low Power Radio stations.

Respectfully submitted,



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*Copies of these Written Comments have been sent
to every party who sent a copy of its Written Comments to us.*

Dated:



November 6, 1999